

**Recent and On-Going Activities at the West Lake Landfill**

- PRPs have agreed to define extent of RIM at the northern boundary of the North Quarry under an EPA workplan and EPA oversight in the field. This will aid in both the decision on an isolation barrier as well as the decision on the final remedy at the site.
- PRPs have agreed to conduct additional investigation in Areas 1 and 2 to refine the boundaries of the location and extent of RIM.
- EPA has also recently directed the PRPs to submit revised work plans related to the partial excavation alternative analysis. This is a key step in moving forward towards the final remedy evaluation.
- EPA is planning pyrolysis testing of soil samples containing RIM. This analysis will expose soil samples to temperatures similar to temperatures associated with those of the SSE in the South Quarry.
- We are continuing to work closely with MDNR to monitor the SSE at the Bridgeton Landfill and evaluate any potential impacts should the SSE come into contact with RIM.
- PRPs have been directed to submit to MDNR all H<sub>2</sub>S and SO<sub>2</sub> landfill gas related data; calculate potential estimated SO<sub>2</sub> emissions from the on-site flares and submit a permit application for the flares that includes sulfur control technologies.
- EPA and MDNR are working together on the SO<sub>2</sub> matter. EPA supports MDNR/AGO in enforcing their deadlines set for the PRPs. If needed, EPA has option of issuing Clean Air Act 114 request for information and/or order for testing.
- EPA and MDNR are exploring options for mobile H<sub>2</sub>S and SO<sub>2</sub> monitoring within the community, which could also help inform any additional monitoring in the community. Potential timeframes – June/July for mobile monitoring and fall for siting stationary air monitors.

**EPA Response to Just Moms STL Request for Relocation:**

- The Bridgeton Landfill (former active sanitary landfill) is included in the 2008 Operable Unit 2 Record of Decision (OU-2 ROD). EPA deferred implementation of an EPA remedial action for the Bridgeton Landfill to the State of Missouri pursuant to the requirements of the state's existing closure and post-closure permit.
- EPA continues to have CERCLA response authority to ensure protectiveness of human health and the environment for releases of hazardous substances from the Bridgeton Landfill.
- EPA's relocation authority under the National Contingency Plan includes: "[t]emporary

or permanent relocation of residents, businesses, and community facilities may be provided **where it is determined necessary to protect human health and the environment**" (Title 40 of the Code of Federal Regulations (40 C.F.R.) section 300, App. D(g)).

- Based on the scientific data we have at this time, EPA has determined that circumstances at the West Lake Landfill Superfund Site do not currently warrant the use of permanent relocation pursuant to CERCLA authority.
- Example of Herculaneum-Doe Run.
  - Lead emissions and lead contaminated soils were suspected to be the cause of elevated blood lead levels in the surrounding community.
  - EPA performed a fund-lead removal action at Herculaneum, as a part of that action EPA provided a temporary, voluntary relocation during the interior cleanup of homes for a limited number of residents with health concerns and/or young children.
  - In addition, Doe Run agreed to implement limited voluntary buyout for residents who lived closest to the smelter **under an April 2002 agreement between Missouri AGO, MDNR and Doe Run** (about 145 out of 173 homeowners accepted a buyout offer).
  - Doe Run was a NAAQS non-attainment area for lead at the time of the buyouts and later for SO<sub>2</sub>. Decisions to offer relocation were not based solely on NAAQS issues with neither lead nor SO<sub>2</sub>, but on the cumulative health effects on the population and unique characteristics of lead (soil/air re-entrainment, blood levels, etc.).
  - Note that SO<sub>2</sub> is much more transient and very unlikely that relocation decision would be based solely on exceedances of SO<sub>2</sub> (or any other) NAAQS in the Bridgeton area. We have several areas in R7 (including St. Louis – Ozone, PM) that are exceeding the NAAQS for one pollutant or another.